



October 11, 2024

VIA ECF

Judge Vince Chhabria
United States District Court
for the Northern District of California
Courtroom 4, 17th Floor
450 Golden Gate Avenue
San Francisco, California 94102

Re: *Kadrey, et al., v. Meta Platforms, Inc.*, Case No. 3:23-cv-03417-VC;
Farnsworth v. Meta Platforms, Inc., Case No. 3:24-cv-06893-VC

Your Honor:

The undersigned counsel in *Kadrey, et al., v. Meta Platforms, Inc.*, Case No. 3:23-cv-03417-VC (“*Kadrey*”), and *Farnsworth v. Meta Platforms, Inc.*, Case No. 3:24-cv-06893-VC (“*Farnsworth*”), jointly submit this letter in response to the Court’s Minute Order of October 4, 2024. *See Kadrey*, Dkt. No. 211; *Farnsworth*, Dkt. No. 20. As ordered by the Court, undersigned counsel met and conferred concerning whether *Farnsworth* should be consolidated with *Kadrey* or stayed, and about leadership issues.

Undersigned counsel agree that judicial economy will be served by consolidating the *Kadrey* and *Farnsworth* actions for largely the same reasons that all parties agreed the actions were related. Should Plaintiff *Farnsworth*’s claims be added, he immediately will begin producing the appropriate discovery and share his availability for deposition, so there should be no delay.

Subject to the Court’s approval, undersigned counsel agree that Boies Schiller Flexner LLP (“BSF”) should serve as interim lead counsel, and Lieff Cabraser Heimann & Bernstein LLP (“LCHB”) should serve as additional counsel. Both BSF and LCHB are committed to bringing their class-action experience, and specific experience in the intersection of copyright and evolving technologies, to this case. We believe such an arrangement best serves the interests of putative class members in an efficient prosecution of Plaintiffs’ claims.

Respectfully submitted,

/s/ Rachel German
Rachel Geman (*pro hac vice*)

/s/ David Boies
David Boies (*pro hac vice*)



LIEFF CABRASER
HEIMANN & BERNSTEIN, LLP
250 Hudson Street, 8th Floor
New York, NY 10013
(212) 355-9500
rgeman@lchb.com

Elizabeth J. Cabraser (SBN 083151)
Daniel M. Hutchinson (SBN 239458)
Reilly T. Stoler (SBN 310761)
275 Battery Street, 29th Floor
San Francisco, CA 94111
(415) 956-1000
ecabraser@lchb.com
dhutchinson@lchb.com
rstoler@lchb.com

David L. Simons (*pro hac vice*)
BOIES SCHILLER FLEXNER LLP
55 Hudson Yards, 20th Floor
New York, NY 10001
(914) 749-8200
dboies@bsflp.com
dsimons@bsflp.com

Maxwell V. Pritt (SBN 253155)
Joshua I. Schiller (SBN 330653)
Joshua M. Stein (SBN 298856)
44 Montgomery Street, 41st Floor
San Francisco, CA 94104
(415) 293-6800
mpritt@bsflp.com
jischiller@bsflp.com
jstein@bsflp.com

Jesse Panuccio (*pro hac vice*)
1401 New York Ave, NW
Washington, DC 20005
(202) 237-2727
jpanuccio@bsflp.com

BSF

ATTESTATION PERSUANT TO CIVIL LOCAL RULES 5-1(h)

I, Jesse Panuccio, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above have concurred in this filing.

Dated: October 11, 2024

/s/ Jesse Panuccio

Jesse Panuccio (*pro hac vice*)
